



December 27, 2017

To: Federal Communications Commission

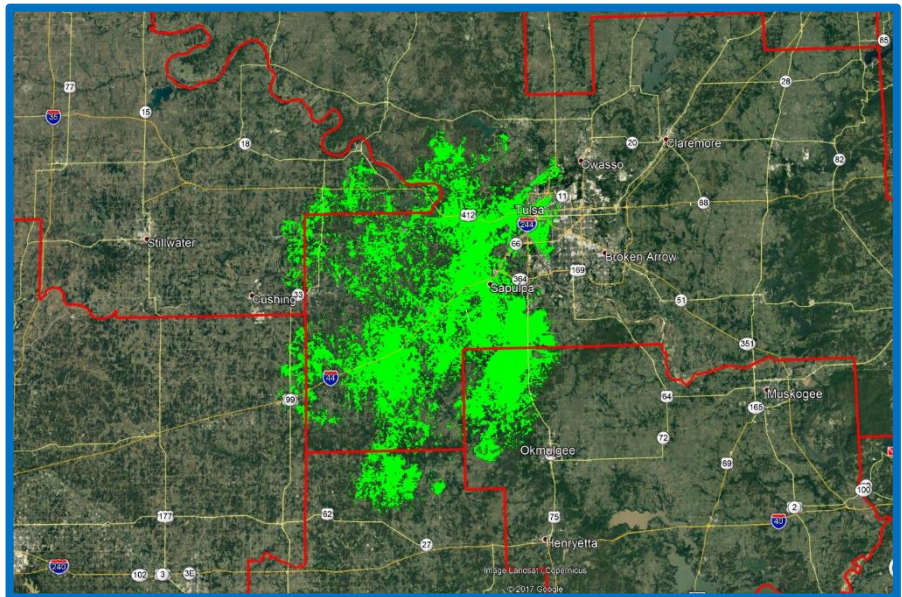
Reg: Proceedings 17-258

Dear FCC Commissioners,

My name is Mike Whelan and I am the majority owner of AirLink Internet Services located in Mounds, OK. My partner and I formed the company in 2010 with our own money because our rural communities had no internet access. We currently serve more than 1600 rural customers and offer speeds from 3Mb to 15Mb. <http://airlinkinternet.net>

After the CBRS rules we adopted in 2015, we began our planning and investments in hardware and infrastructure to deploy service in the 3550-3650 band. In addition, we currently have 6 active 3650-3700 registrations used for backhauling data between towers. The 3650 band has been an important asset in our growth and ability to serve rural Oklahoma customers.

The proposed PAL auction rule changes will significantly reduce our ability to participate in the auction and significantly reduce our ability serve rural customers. This map shows AirLink's coverage area in green. The red lines are the Partial Economic Area (PEA) for the Tulsa, Oklahoma area. If the FCC was to change the existing rules to conduct PAL auctions based on PEAs, AirLink would need to purchase 5 PEAs for our coverage area. Because the PEAs are so large and our coverage area includes 5 different PEAs, it wouldn't be financially possible to participate in the auction.



Please do not use PEAs as a basis for geographical areas for the PAL auctions. Census tracts are much smaller and would enable us to participate in the PAL auctions and rapidly deploy new services to the rural areas of Oklahoma.



Another important aspect of the 3550-3650 band is that it would enable AirLink to provide service in areas where service is currently unavailable due to topographical limitations. The above map also shows uncovered areas within our green service area that are difficult to serve with 5GHz frequencies and the rolling, woodland hills of North East Oklahoma. The 3550-3650 band has excellent near line of sight capabilities. With very little time and investment, AirLink would deploy new 3550-3650 band equipment on existing towers and provide service to many new homes and businesses that are currently unable to receive service.

Please do not change the existing PAL auctions rules. We have invested a lot of time and money in anticipation of this new spectrum becoming available. As a small business, we have planned to participate in the PAL auctions based on census tracts. Please do not take this opportunity away from our small business. We have invested our own money and worked hard for the last 7 years bringing internet service to rural homes and businesses. Please help us continue our efforts by keeping the PAL auctions based on census tracts.

Thank you and best regards,

A handwritten signature in blue ink that reads "Mike Whelan".

Mike Whelan, President
AirLink Internet Services